

**FILED**

**AUG -1 2019**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**THOMAS G. BRUTON**  
CLERK, U.S. DISTRICT COURT  
**JUDGE DURKIN**

UNITED STATES OF AMERICA

v.

MATTHEW GREGORY BERGER

**MAGISTRATE JUDGE GILBERT**  
No. 18 CR 873

Violations: Title 18, United States  
Code, Section 875(c); Title 18, United  
States Code, Section 115(a)(1)(B)

**Superseding Indictment**

**COUNT ONE**

The SPECIAL JULY 2018 GRAND JURY charges:

On or about December 3, 2018, at approximately 8:07 p.m. Eastern Standard  
Time, at Chicago, in the Northern District of Illinois, Eastern Division, and  
elsewhere,

MATTHEW GREGORY BERGER,

defendant herein, knowingly and willfully transmitted in interstate commerce a  
communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

**COUNT TWO**

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about December 3, 2018, at approximately 8:13 p.m. Eastern Standard Time, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MATTHEW GREGORY BERGER,  
defendant herein, knowingly and willfully transmitted in interstate commerce a communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about December 6, 2018, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

MATTHEW GREGORY BERGER,

defendant herein, knowingly and willfully transmitted in interstate commerce a  
communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

**COUNT FOUR**

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about December 14, 2018, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

MATTHEW GREGORY BERGER,

defendant herein, knowingly and willfully transmitted in interstate commerce a  
communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

**COUNT FIVE**

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about December 17, 2018, at Chicago, in the Northern District of Illinois,  
Eastern division, and elsewhere,

MATTHEW GREGORY BERGER,  
defendant herein, did threaten to assault and murder Federal law enforcement  
officers, with intent to impede, intimidate, and interfere with such officers while  
engaged in the performance of their official duties and with intent to retaliate against  
Federal law enforcement officers on account of the performance of their official duties;  
to wit, in that BERGER threatened to assault and kill employees of the U.S. Federal  
Bureau of Investigation;

In violation of Title 18, United States Code, Section 115(a)(1)(B).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY